

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO.
	)	
Plaintiff,	)	JUDGE
	)	
v.	)	
	)	
TWO (2) FIREARMS SEIZED FROM	)	
VINCENTE TURNER ON NOVEMBER 8,	)	
2019, PURSUANT TO THE EXECUTION	)	
OF A FEDERAL SEARCH WARRANT,	)	
	)	
Defendants.	)	<b>COMPLAINT IN FORFEITURE</b>

NOW COMES plaintiff, the United States of America, by Justin E. Herdman, United States Attorney for the Northern District of Ohio, and James L. Morford, Assistant U.S. Attorney, and files this Complaint in Forfeiture, respectfully alleging on information and belief the following:

JURISDICTION AND INTRODUCTION

1. This Court has subject matter jurisdiction over an action commenced by the United States under 28 U.S.C. Section 1345, and over an action for forfeiture under 28 U.S.C. Section 1355(a). This Court also has jurisdiction over this particular action under 21 U.S.C. Section 881(a)(11).

2. This Court has *in rem* jurisdiction over the defendant firearms pursuant to: (i) 28 U.S.C. Section 1355(b)(1)(A) because acts giving rise to the forfeiture occurred in this district;

and, (ii) 28 U.S.C. Section 1355(b)(1)(B), incorporating 28 U.S.C. Section 1395, because the action accrued in this district and the defendant firearms are found in this district.

3. This Court will have control over the defendant firearms through service of an arrest warrant *in rem*, which the Drug Enforcement Administration (DEA) will execute upon the defendant firearms. *See*, Supplemental Rules G(3)(b) and G(3)(c).

4. Venue is proper in this district pursuant to: (i) 28 U.S.C. Section 1355(b)(1)(A) because acts giving rise to the forfeiture occurred in this district; and, (ii) 28 U.S.C. Section 1395 because the action accrued in this district and the defendant firearms are found in this district.

5. On November 8, 2019, the defendant firearms were seized at the Kirk Road, Youngstown, Ohio, residence of Vincente Turner pursuant to the execution of a federal search warrant. The defendant firearms are now in the custody of the DEA.

6. The DEA commenced an administrative forfeiture proceeding against the defendant firearms. A claim to the defendant firearms was submitted in the administrative forfeiture proceeding by Vincente Turner, thereby requiring the filing of the instant judicial forfeiture action.

7. The defendant firearms are subject to forfeiture to the United States under 21 U.S.C. Section 881(a)(11) in that they were used – or were intended to be used – to facilitate the transportation, sale, receipt, possession, or concealment of controlled substances.

#### **DESCRIPTION OF THE DEFENDANT FIREARMS**

8. The following firearms are the defendant firearms in the instant case. When test fired, both firearms functioned properly:

- Bushmaster XM-15E2S .223 caliber rifle, serial number: BK5078643, with magazine and any ammunition.

- FN Herstal Five-Seven 5.7 x 28mm pistol, serial number: 38629825, with magazine and ammunition.

### FORFEITURE

9. On November 8, 2019, at approximately 6:45 a.m., members of the DEA Youngstown Resident Office (YRO) executed a federal search warrant at the residence of Vincente Turner located at [redacted] Kirk Road, Youngstown, Ohio.

10. After entry into the residence, YRO members encountered – and subsequently detained – Vincente Turner. *Inter alia*, the following items were located and seized pursuant to the execution of the search warrant:

- a.) black digital scale with cocaine residue seized from the kitchen cabinet above the stove.
- b.) two (2) knotted plastic bags containing cocaine (approximately 48.0 grams) seized from a drawer behind the bar in the basement.
- c.) plastic bag containing cocaine residue seized from behind the bar in the basement.
- d.) small knotted plastic baggie containing cocaine (approximately 5.703 grams) seized from behind the bar in the basement.
- e.) glass mirror with cocaine residue seized from the top of the bar in the basement.
- f.) black Safeguard ballistic vest located in the main first floor hallway closet.
- g.) the defendant Bushmaster XM-15E2S .223 caliber rifle, serial number: BK5078643, with magazine, located on the top shelf of a bedroom closet.
- h.) the defendant FN Herstal Five-Seven 5.7 x 28mm pistol, serial number: 38629825, with magazine and ammunition – namely, (30) 5.7 x 28 rounds - located in the living room.

11. At approximately 7:00 a.m., Turner was interviewed by task force officers. He was advised of his *Miranda* rights, and acknowledged that he (Turner) understood his rights and was willing to answer questions from investigators.

12. Turner was asked if there were any illegal narcotics, guns, or large amounts of U.S. currency located within his residence. Turner said that he had an ounce or two of cocaine in the basement in the bar area and that he had guns in his bedroom and one in the living room.

13. Turner then discussed where the cocaine came from that he had possession of in his residence. Turner stated that he has only been buying an ounce or two of cocaine recently, but was buying nine (9) ounce quantities at a time in the past and – a couple of months ago – did buy a “brick” (kilogram).

14. Turner said that he himself sells gram or less quantities of cocaine.

15. Investigators asked Turner about the time he spent in Miami, Florida, and any narcotics connections he made when living there. Turner stated that he was buying kilogram quantities of cocaine.

### CONCLUSION

16. By reason of the foregoing, the defendant firearms are subject to forfeiture to the United States under 21 U.S.C. § 881(a)(11) in that they were used – or were intended to be used – to facilitate the transportation, sale, receipt, possession, or concealment of controlled substances.

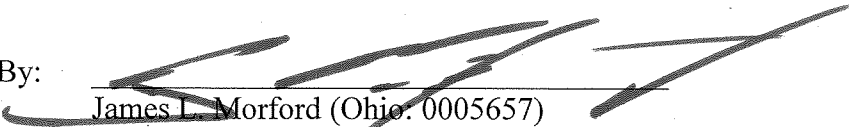
WHEREFORE, plaintiff, the United States of America, respectfully requests that this Court enter judgment condemning the defendant firearms and forfeiting them to the United States under 21 U.S.C. § 881(a)(11), and providing that the defendant firearms be delivered into

the custody of the United States for disposition according to law, and for such other relief as this Court may deem proper.

Respectfully submitted,

Justin E. Herdman  
U.S. Attorney, Northern District of Ohio

By:



James L. Morford (Ohio: 0005657)  
Assistant United States Attorney, N.D. Ohio  
Carl B. Stokes U.S. Court House  
801 West Superior Avenue, Suite 400  
Cleveland, Ohio 44113  
216.622.3743 / James.Morford@usdoj.gov

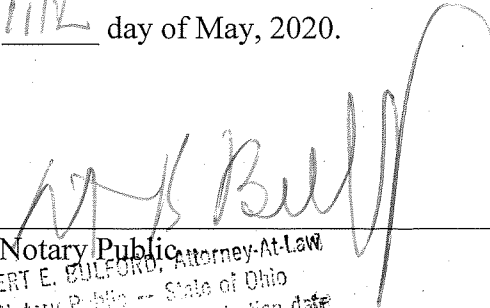
**VERIFICATION**

STATE OF OHIO                    )  
  ) SS.  
COUNTY OF CUYAHOGA        )

I, James L. Morford, under penalty of perjury, depose and say that I am an Assistant United States Attorney for the Northern District of Ohio, and the attorney for the plaintiff in the within entitled action. The foregoing Complaint in Forfeiture is based upon information officially provided to me and, to my knowledge and belief, is true and correct.

  
James L. Morford (Ohio: 0005657)  
Assistant United States Attorney, N.D. Ohio

Sworn to and subscribed in my presence this 11<sup>th</sup> day of May, 2020.

  
Notary Public, Attorney-At-Law  
ROBERT E. BULFORD, State of Ohio  
My commission expires on expiration date  
5.11.2023 E.C.

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

United States of America

(b) County of Residence of First Listed Plaintiff  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

James L. Morford, Assistant U.S. Attorney - 400 U.S. Court House,  
801 West Superior Avenue, Cleveland, Ohio 44113 - 216.622.3743

## DEFENDANTS

Two (2) Firearms seized from Vincente Turner on November 8, 2019,  
pursuant to the execution of a federal search warrant.

County of Residence of First Listed Defendant Mahoning  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff  
☐ 2 U.S. Government Defendant  
☐ 3 Federal Question (U.S. Government Not a Party)  
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input checked="" type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding  
☐ 2 Removed from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from Another District (specify)  
☐ 6 Multidistrict Litigation - Transfer  
☐ 8 Multidistrict Litigation - Direct File

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause:

Civil Forfeiture Action under 21 U.S.C. Section 881(a)(11).

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE  
05/13/2020

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE



UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO

I. Civil Categories: (Please check one category only).

1. ☒ General Civil  
2. ☐ Administrative Review/Social Security  
3. ☐ Habeas Corpus Death Penalty

\*If under Title 28, §2255, name the SENTENCING JUDGE: \_\_\_\_\_

CASE NUMBER: \_\_\_\_\_

II. **RELATED OR REFILED CASES.** See LR 3.1 which provides in pertinent part: "If an action is filed or removed to this Court and assigned to a District Judge after which it is discontinued, dismissed or remanded to a State court, and subsequently refiled, it shall be assigned to the same Judge who received the initial case assignment without regard for the place of holding court in which the case was refiled. Counsel or a party without counsel shall be responsible for bringing such cases to the attention of the Court by responding to the questions included on the Civil Cover Sheet."

This action is ☐ **RELATED** to another **PENDING** civil case. This action is ☐ **REFILED** pursuant to LR 3.1.

If applicable, please indicate on page 1 in section VIII, the name of the Judge and case number.

III. In accordance with Local Civil Rule 3.8, actions involving counties in the Eastern Division shall be filed at any of the divisional offices therein. Actions involving counties in the Western Division shall be filed at the Toledo office. For the purpose of determining the proper division, and for statistical reasons, the following information is requested.

ANSWER ONE PARAGRAPH ONLY. ANSWER PARAGRAPHS 1 THRU 3 IN ORDER. UPON FINDING WHICH PARAGRAPH APPLIES TO YOUR CASE, ANSWER IT AND STOP.

(1) **Resident defendant.** If the defendant resides in a county within this district, please set forth the name of such county

**COUNTY:**

**Corporation** For the purpose of answering the above, a corporation is deemed to be a resident of that county in which it has its principal place of business in that district.

(2) **Non-Resident defendant.** If no defendant is a resident of a county in this district, please set forth the county wherein the cause of action arose or the event complained of occurred.

**COUNTY:** Mahoning County

(3) **Other Cases.** If no defendant is a resident of this district, or if the defendant is a corporation not having a principle place of business within the district, and the cause of action arose or the event complained of occurred outside this district, please set forth the county of the plaintiff's residence.

**COUNTY:**

IV. The Counties in the Northern District of Ohio are divided into divisions as shown below. After the county is determined in Section III, please check the appropriate division.

**EASTERN DIVISION**

- ☐ AKRON  
☐ CLEVELAND  
☒ YOUNGSTOWN

(Counties: Carroll, Holmes, Portage, Stark, Summit, Tuscarawas and Wayne)  
(Counties: Ashland, Ashtabula, Crawford, Cuyahoga, Geauga, Lake,  
Lorain, Medina and Richland)  
(Counties: Columbiana, Mahoning and Trumbull)

**WESTERN DIVISION**

- ☐ TOLEDO

(Counties: Allen, Auglaize, Defiance, Erie, Fulton, Hancock, Hardin, Henry,  
Huron, Lucas, Marion, Mercer, Ottawa, Paulding, Putnam, Sandusky, Seneca  
VanWert, Williams, Wood and Wyandot)



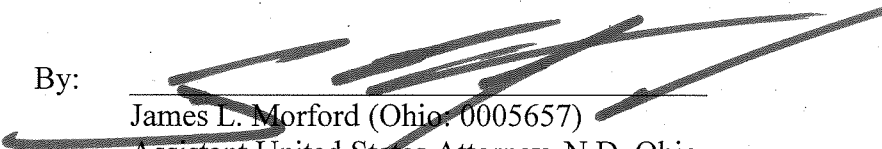
IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO.
	)	
Plaintiff,	)	JUDGE
	)	
v.	)	
	)	
TWO (2) FIREARMS SEIZED FROM	)	
VINCENTE TURNER ON NOVEMBER 8,	)	
2019, PURSUANT TO THE EXECUTION	)	
OF A FEDERAL SEARCH WARRANT,	)	
	)	
Defendants.	)	<b>PRAECIPE</b>

The United States of America respectfully requests that the Clerk of this Court issue the attached Warrant of Arrest *in Rem* to the Drug Enforcement Administration (DEA) pursuant to Rule G(3)(b)(i) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions.

Respectfully submitted,  
Justin E. Herdman  
U.S. Attorney, Northern District of Ohio

By:

  
James L. Morford (Ohio: 0005657)  
Assistant United States Attorney, N.D. Ohio  
Carl B. Stokes U.S. Court House  
801 West Superior Avenue, Suite 400  
Cleveland, Ohio 44113  
216.622.3743 / James.Morford@usdoj.gov

# United States District Court

NORTHERN DISTRICT OF OHIO

## WARRANT OF ARREST *IN REM*

TO: THE DRUG ENFORCEMENT ADMINISTRATION (DEA), UNITED STATES MARSHAL,  
AND/OR ANY OTHER DULY AUTHORIZED LAW ENFORCEMENT OFFICER:

WHEREAS, on May 13, 2020 a Complaint in Forfeiture  
was filed in this Court by Justin E. Herdman, United States Attorney for this District, on behalf of the United States,  
against:

Bushmaster XM-15E2S .223 caliber rifle, serial number: BK5078643, with magazine and any  
ammunition (Asset ID Number: 20-DEA-657933); and,

FN Herstal Five-Seven 5.7 x 28mm pistol, serial number: 38629825, with magazine and ammunition  
(Asset ID Number: 20-DEA-657935).

and WHEREAS, the defendant firearms are currently in the possession, custody, or control of the United  
States; and,

WHEREAS, Rule G(3)(b)(i) of the Supplemental Rules for Admiralty or Maritime Claims and Asset  
Forfeiture Actions directs the Clerk of the Court to issue a Warrant of Arrest *In Rem* for the arrest of the  
defendant firearms; and,

WHEREAS, Rule G(3)(c) of the Supplemental Rules for Admiralty or Maritime Claims and Asset  
Forfeiture Actions provides that the Warrant of Arrest *In Rem* must be delivered to a person or organization  
authorized to execute it;

YOU ARE COMMANDED to arrest the defendant firearms by serving a copy of this warrant on the  
custodian in whose possession, custody, or control the firearms are presently found, and to use whatever means may  
be appropriate to protect and maintain its custody until further order of this Court.

YOU ARE FURTHER COMMANDED to file the same in this Court with your return thereon.

WITNESS THE HONORABLE		UNITED STATES DISTRICT JUDGE AT	
DATE May 13, 2020	CLERK  (BY) DEPUTY CLERK		
Returnable _____ days after issue.			
Drug Enforcement Administration			
DISTRICT	DATE RECEIVED	DATE EXECUTED	
PRINTED NAME	SIGNATURE		

U.S. Department of Justice  
United States Marshals Service

# PROCESS RECEIPT AND RETURN

See "Instructions for Service of Process by U.S. Marshal"

PLAINTIFF United States of America	COURT CASE NUMBER
DEFENDANT Two (2) Firearms Seized from Vincente Turner on 11/08/2019 in Youngstown, Ohio	TYPE OF PROCESS Warrant of Arrest in Rem
<b>SERVE AT</b> { NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE OR CONDEMN Two (2) Firearms Seized from Vincente Turner on November 8, 2020, in Youngstown, Ohio ADDRESS (Street or RFD, Apartment No., City, State and ZIP Code)	

SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW	Number of process to be served with this Form 285	1
James L. Morford, Assistant United States Attorney, Office of the United States Attorney, Northern District of Ohio 400 United States Court House, 801 West Superior Avenue Cleveland, Ohio 44113 - 216.622.3743	Number of parties to be served in this case	2
	Check for service on U.S.A.	

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Include Business and Alternate Addresses, All Telephone Numbers, and Estimated Times Available for Service):

Fold

Fold

Two (2) Firearms Seized from Vincente Turner on November 8, 2020, in Youngstown, Ohio; namely:  
 Bushmaster XM-15E2S .223 caliber rifle, serial number: BK5078643, with magazine and any ammunition (Asset ID Number: 20-DEA-657933); and, FN Herstal Five-Seven 5.7 x 28mm pistol, serial number: 38629825, with magazine and ammunition (Asset ID Number: 20-DEA-657935).

Signature of Attorney other Originator requesting service on behalf of:	<input checked="" type="checkbox"/> PLAINTIFF <input type="checkbox"/> DEFENDANT	TELEPHONE NUMBER 216.622.3743	DATE 5/13/20
---	---	----------------------------------	-----------------

## SPACE BELOW FOR USE OF U.S. MARSHAL ONLY-- DO NOT WRITE BELOW THIS LINE

I acknowledge receipt for the total number of process indicated. (Sign only for USM 285 if more than one USM 285 is submitted)	Total Process	District of Origin	District to Serve	Signature of Authorized USMS Deputy or Clerk	Date
		No. _____	No. _____		

I hereby certify and return that I ☐ have personally served, ☐ have legal evidence of service, ☐ have executed as shown in "Remarks", the process described on the individual, company, corporation, etc., at the address shown above on the on the individual, company, corporation, etc. shown at the address inserted below.

☐ I hereby certify and return that I am unable to locate the individual, company, corporation, etc. named above (See remarks below)

Name and title of individual served (if not shown above)	<input type="checkbox"/> A person of suitable age and discretion then residing in defendant's usual place of abode
Address (complete only different than shown above)	Date _____ Time _____ <input type="checkbox"/> am <input type="checkbox"/> pm
	Signature of U.S. Marshal or Deputy

Service Fee	Total Mileage Charges including endeavors)	Forwarding Fee	Total Charges	Advance Deposits	Amount owed to U.S. Marshal* or (Amount of Refund*)
					<b>\$0.00</b>

REMARKS:

### PRINT 5 COPIES:

1. CLERK OF THE COURT
2. USMS RECORD
3. NOTICE OF SERVICE
4. BILLING STATEMENT\*: To be returned to the U.S. Marshal with payment, if any amount is owed. Please remit promptly payable to U.S. Marshal.
5. ACKNOWLEDGMENT OF RECEIPT

PRIOR EDITIONS MAY BE USED

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO.
	)	
Plaintiff,	)	JUDGE
	)	
v.	)	
	)	
TWO (2) FIREARMS SEIZED FROM	)	
VINCENTE TURNER ON NOVEMBER 8,	)	
2019, PURSUANT TO THE EXECUTION	)	
OF A FEDERAL SEARCH WARRANT,	)	
	)	
Defendants.	)	<b>NOTICE OF FORFEITURE</b>

To: Vincente Turner  
[redacted] Kirk Road  
Youngstown, Ohio 44511

The above-captioned forfeiture action was filed in U.S. District Court on May 13, 2020.

A copy of the Complaint in Forfeiture is attached. If you claim an interest in the defendant firearms, the following applies.

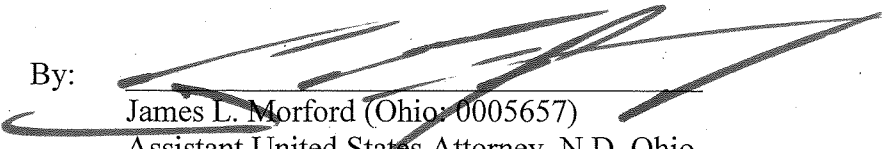
Pursuant to Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, you are required to file with the Court, and serve upon James L. Morford, plaintiff's attorney, whose address is United States Attorney's Office, 400 United States Court House, 801 West Superior Avenue, Cleveland, Ohio 44113, a verified claim to the defendant firearms within 35 days after your receipt of the complaint. The claim shall contain the information required by Rule G(5) of the said Supplemental Rules. Additionally, you must

file and serve an answer to the complaint, or a motion under Rule 12 of the Federal Rules of Civil Procedure, within 20 days after the filing of the claim, exclusive of the date of filing. If you fail to do so, judgment will be taken for the relief demanded in the complaint.

Respectfully,

Justin E. Herdman  
U.S. Attorney, Northern District of Ohio

By:



James L. Morford (Ohio: 0005657)  
Assistant United States Attorney, N.D. Ohio  
Carl B. Stokes U.S. Court House  
801 West Superior Avenue, Suite 400  
Cleveland, Ohio 44113  
216.622.3743 / James.Morford@usdoj.gov

Date: May 13, 2020